REMARKS

Reconsideration and further examination of the subject patent application in view of the present Amendment, and the following Remarks is respectfully requested. Claims 1-20 are currently pending in the application. Claims 1, 5, 8, 12 and 15 have been rejected under 35 U.S.C. §112, second paragraph as being indefinite. Claims 1, 6-8, 13-15 and 19 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Pat. Application Publication No. 2002/0035474 to Alpdemir, claims 2, 9 and 16 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Alpdemir in view of Gavan et al. (U.S. Pat. No. 6,601,048), and claims 3-4, 10-11, 17 and 20 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Alpdemir in view of Saylor et al. (U.S. Pat. No. 6,792,086). Independent claims 1, 8, 15 and 20 have been amended, dependent claims 2, 4-7, 9, and 12-14 have been amended. After careful review of the claims and references, applicant believes that the claims are in allowable form and therefore a Notice of Allowance is respectfully requested.

Claims 1, 8 and 15 have been rejected as indefinite because of the phrase "substantially limited to..." This has been corrected by amendments to claim 1, 8 and 15. Claim 5 and 12 have been rejected as indefinite for use of the phrase "normally associated..." This has been corrected by removing the term "normally" from claims 5 and 12.

The independent claims 1, 8, and 15 as well as dependent claims 6, 7, 13, 14 and 19 have been rejected as anticipated by Alpdemir. The Examiner has indicated that Alpdemir discloses use of a artificial engine to process and answer queries. However, Alpdemir does not disclose the use of an artificial intelligence engine for forming answers to queries from callers as claimed. The citation to Alpdemir pointed out by the Examiner (Office Action p. 2, para 2, line 11) does not provide a disclosure of the claimed use of an artificial intelligence engine to answer the call center queries at all. Instead, it merely mentions that artificial intelligence is generally known and states that there will be no description of artificial intelligence. (See Alpdemir para [0141], line 8-9"... and artificial intelligence are known in the art and not described in greater detail

here"). This brief comment does not give a description of the use of artificial intelligence at all and in no way discloses use to answer queries about the activities of the organization as claimed. In addition, the claims 1, 15 and 20 also call for an activities intelligence engine with a knowledge universe comprising enterprise activities of the organization, while claims 7 and 8 limit the knowledge universe to enterprise activities. As described, in the specification (e.g., p. 8, para 4) this provides unique advantages, and is not disclosed in Alpdemir which does not describe any implementation of an artificial intelligence engine. Thus, the independent claims 1, 8, 15, and 20 distinguish over Alpdemir for at least the above two reasons, and are therefore believed to be allowable.

Claims 2, 9, and 16 have been rejected as obvious over Alpdemir in view of Gavan et al. ("Gavan"). As discussed above, Alpdemir does not teach use of an artificial intelligence engine to form answers to caller queries, and neither does Gavan. Gavan discloses a system for processing event records and uses an AI engine for pattern recognition in the records for detecting fraud. Thus, while Gavan teaches detection of patterns in event records, it does not teach use of artificial intelligence to answer queries from callers about the enterprise activities as claimed. Thus, neither reference discloses this feature. In addition, claims 2, 9 and 16 call for use of call records to form a context for forming answers to the caller queries. Gavan, concerned with the entirely different issue of looking for fraud patterns in event records, fails to teach or suggest this feature. Thus, neither Alpdemir nor Gavan disclose the claimed feature of using the call records to form the context for forming answers to the caller queries. Accordingly, claims 2, 9 and 16 are believed to be distinguishable over the combination of Alpdemir and Gavan.
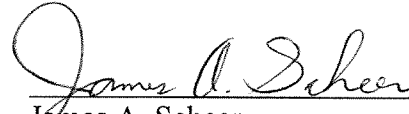
Claims 3-4, 10-11, 17 and 20 was rejected as obvious over Alpdemir in view of Saylor et al. ("Saylor"). Saylor also fails to disclose use of an artificial intelligence engine to form answers to caller queries. Thus, none of the cited references teach this feature, and the claims 3-4, 10-11, 17 and 20 are therefore distinguishable over the combination.

As discussed above, all pending claims 1-20 claim features which are not disclosed in any of the cited references. Therefore, claims 1-20 are believed to be allowable over any combination of the cited references.

For the foregoing reasons, applicant submits that the subject application is in condition for allowance and earnestly solicits a Notice of Allowance. Should the

Examiner be of the opinion that a telephone conference would expedite prosecution of the subject application, the Examiner is respectfully requested to call the undersigned at the below-listed number.

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Respectfully submitted,

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